

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	No. 07 CR- 843-9
vs.	)	Judge Lefkow
	)	
<b>ROBERT FREEMAN</b>	)	
	)	

**NOTICE OF MOTION**

TO: Rachel Cannon, Assistant United States Attorney, 219 S. Dearborn, Chicago, Illinois, 60604

PLEASE TAKE NOTICE that this 9th day of May 2008, I filed with the Clerk for the Northern District Court of Illinois, Defendant's Petition for Pre-Trial Release and to Set Bail, a copy of which is attached hereto, and on May 20, 2008, or as soon thereafter as counsel may be heard, I will appear before the Honorable Judge Schenkier, 219 S. Dearborn, Chicago, Illinois 60604 and then and there present my Petition.

Respectfully Submitted,

\_\_\_\_\_  
PAUL E. PAPROCKI

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the following document:  
**DEFENDANT'S PETITION FOR PRE-TRIAL RELEASE AND TO SET BAIL**  
was served on May 8th, 2008, in accordance with Fed. R. Crim. P. 49, Local Rule 5.5 and the General Order on Electronic Case Filing (ECF), pursuant to the District Court's system as to ECF filers.

s/ Paul E. Paprocki  
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<b>UNITED STATES OF AMERICA</b>	)
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**MOTION FOR PRE-TRIAL RELEASE AND TO SET BAIL**

NOW COMES PAUL E. PAPROCKI attorney for ROBERT FREEMAN and hereby moves this Honorable Court for the pre-trial release of the defendant and to set reasonable bail in this matter. In support of said motion, the defendant states as follows:

1. That PAUL E. PAPROCKI has previously filed an appearance on behalf of ROBERT FREEMAN in the above named matter.
2. That the defendant, ROBERT FREEMAN along with other co-defendants has been charged with a criminal offense that alleges a conspiracy to possess and distribute a controlled substance.
3. That the defendant was arrested on December 18, 2007 and elected not to oppose the governments motion that he be held in custody at his originally scheduled detention hearing. At the time of his initial detention the defendant reserved his right to a hearing for pre-trial release.
4. The defendant is currently being held in the Jerome Combs Detention Center in Kankakee, Illinois.
5. The defendant has strong ties to the community, specifically to the City of

Chicago where he has lived his entire life. Further, the defendant's entire family, including his mother, father, sister and brothers all live in the Northern District of Illinois.

6. The defendant has five children, each of whom he maintains frequent contact with, as well as a long term relationship with Juanta Hall. Ms. Hall and all of the defendant's children live in the state of Illinois.

7. That other co-defendants in this matter have been granted pre-trial release when the court found that reasonable conditions would insure their compliance with attendance of court proceedings.

8. That the defendant is not a threat to the community.

9. That members of the defendant's family have gathered the sum of \$10,000.00 and are willing to post this amount to allow for the defendant's release.

10. The defendant is a good candidate for pre-trial release on bond or house arrest and that reasonable condition could be set to ensure the defendant's appearance during the pendency of this matter.

WHEREFORE, PAUL E. PAPROCKI prays that this Honorable Court to grant his motion for the pre-trial release of ROBERT FREEMAN and enter an order allowing the defendant to be released on bail.

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PAUL E. PAPROCKI

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